

September 29, 2022

VIA ECF

The Honorable George B. Daniels
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *In re Terrorist Attacks on September 11, 2001*, No. 03-md-1570 (GBD) (SN)
Havlish, et al. v. Bin Laden, et al., No. 03-cv-9848 (GBD) (SN)
John Does 1 through 7 v. the Taliban, et al., No. 20-mc-740 (GBD) (SN)
Federal Insurance Co., et al. v. al Qaida, et al., No. 03-cv-6978 (GBD) (SN)
Smith v. the Islamic Republic of Iraq, No. 01-cv-10132 (GBD) (SN)
Request for Extension of Time to File Objections to Report and Recommendation

Dear Judge Daniels:

On behalf of Judgment Creditors Fiona Havlish, *et al.* (the “Havlish Creditors”), Judgment Creditors John Does 1 through 7 (the “Doe Creditors”), Judgment Creditors Federal Insurance Co., *et al.* (the “Federal Insurance Creditors”), and Judgment Creditors Estate of Smith, *et al.* (the “Smith Creditors”—collectively, the “Joint Judgment Creditors”—we submit this letter to request a further thirty-day extension of the deadline to file objections to Magistrate Judge Netburn’s August 26, 2022 Report and Recommendation (“Report”), Dkt. 8463, which recommended the denial of our clients’ turnover motions (Dkts. 7763, 7767, 7936; *Smith* Dkt. 62).

The Joint Judgment Creditors continue to work together to coordinate their objections to the Report. However, the coordination discussions among several independent groups of judgment creditors on the significant issues presented in this litigation are requiring more time than anticipated. Unanticipated challenges for counsel have presented additional complications requiring additional time. Counsel for the Doe Creditors are located in southern Florida and have had to close their offices due to Hurricane Ian. Counsel for the Havlish Creditors have also been confronted with developments in other matters requiring extended international and domestic travel, some of which has been entirely unexpected, and this has contributed to the need for additional time. Finally, the Joint Judgment Creditors also note that a further extension will permit them to account fully for recent developments in other cases which may bear on the Court’s consideration of their objections.

The Joint Judgment Creditors therefore request an additional thirty-day extension of the deadline to object to the Report pursuant to Fed. R. Civ. P. 72(b)(2). Currently, objections to the Report are due October 11, 2022. Dkt. 8470. The Joint Judgment Creditors propose that the deadline be extended to November 10, 2022. No parties to this action would be prejudiced by this extension.

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This is the Joint Judgment Creditors' second request for an extension of this deadline. The Joint Judgment Creditors do not anticipate that any further extensions will be necessary, and will endeavor to file objections earlier than the deadline if it proves possible to do so.

We thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Lee Wolosky
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cc: All counsel of record (by ECF)